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Before the
Federal Communications Commission
Washington, D.C. 20554

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Federal Communications Commission
Office of Secretary

In the Matter of)
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)

Advanced Television Systems)
and Their Impact Upon the)
Existing Television Broadcast)
Service)

MM Docket No. 87-268

TO: The Commission

PETITION FOR PARTIAL RECONSIDERATION
OF THE SIXTH REPORT & ORDER
SUBMITTED BY TRIBUNE BROADCASTING COMPANY

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DATED: June 13, 1997

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PETITION FOR PARTIAL RECONSIDERATION
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SUBMITTED BY TRIBUNE BROADCASTING COMPANY

Tribune Broadcasting Company ("Tribune"), on behalf of its sixteen television stations, hereby files this Petition for Partial Reconsideration of the Federal Communications Commission's Sixth Report and Order, FCC 97-115, released April 21, 1997 ("Sixth Report & Order").¹ Although Tribune has joined in the Petition for Clarification and Partial Reconsideration of

¹ Tribune Broadcasting Company is the wholly owned subsidiary of Tribune Company. Tribune Company is the ultimate corporate parent of the licensees of the following sixteen television stations: WPIX, New York, NY; KTLA, Los Angeles, CA; WGN-TV, Chicago, IL; WPHL-TV, Philadelphia, PA; WLVI-TV, Cambridge, MA; KDAF, Dallas, TX; WGNX, Atlanta, GA; KHTV, Houston, TX; WDZL, Miami, FL; KWGN-TV, Denver, CO; KTXL, Sacramento, CA; WXIN, Indianapolis, IN; KSWB-TV, San Diego, CA; WTIC-TV, Hartford, CT; WGNO, New Orleans, LA; and WPMT, York, PA.

the Fifth and Sixth Reports and Orders filed by the Association for Maximum Service Telecasters and Other Broadcasters, it has filed this separate Petition in order to demonstrate the extent of predicted interference to be received by its various stations to either or both of their NTSC or DTV assignments, as a result of violations of the Commission's own spacing requirements. Additionally, Tribune urges the Commission to improve the replication of NTSC coverage of certain of its stations, to address the issue of the use of wireless microphones by broadcasters, and to consider the impact of DTV-DTV interference.²

I. THE COMMISSION'S FAILURE TO ADHERE TO NTSC-DTV SPACING RESTRICTIONS HAS RESULTED IN EXCESSIVE INTERFERENCE.

Tribune applauds the Commission for moving forward with the assignment of a DTV channel to every eligible broadcaster. Tribune believes that the Commission does need to act now to ensure that the American public will continue to receive the highest quality, free, over-the-air television service into the twenty-first century. Tribune also strongly supports the Commission's decision to replicate each station's existing NTSC

² Tribune also expressly reserves the right to supplement this Petition following a review of OET Bulletin 69 and an analysis of its impact on Tribune's NTSC and DTV operations.

service area in the new DTV allotment table. Sixth Report & Order, ¶ 29.

However, the Commission has declined to make full use of the entire spectrum presently utilized by broadcast television and has instead attempted to confine digital television channels to a DTV core spectrum of either channels 2-46 or 7-51. Sixth Report & Order, ¶¶ 82-84. As a result, the Commission has been unable to adhere to its own minimum separation requirements in the new DTV Table of Allotments/Assignments ("DTV Table")³ -- creating a number of short-spaced allocations which will inevitably result in unacceptable interference to existing NTSC service or to proposed DTV service. The impact will be felt by broadcasters and by viewers in two ways. First, where existing NTSC service will receive new interference from new DTV assignments, the public will no longer be able to receive NTSC service that is currently available to it. Second, where proposed DTV service will receive interference from existing NTSC stations, the public will not reap the full benefits of digital service and the growth and acceptance of that service will be delayed or frustrated. Accordingly, Tribune submits that the Commission should re-do the DTV Table, adhering more closely to its spacing requirements, even if in doing so the Commission must allot channels outside the "DTV core spectrum." Tribune submits

³ Sixth Report & Order, App. B. See also 47 C.F.R. § 73.622(b).

that the objectives behind that core can instead be realized when the television bands are "re-packed" after the transition to digital television.

Specifically, Tribune has conducted preliminary analyses of potential interference for the NTSC and DTV channels assigned to each of its sixteen television stations. Under the supervision of Michael B. McKinnon, its Director of Station Engineering, Tribune contracted with Dataworld, Inc. to prepare maps and tables demonstrating interference, using the applicable Longley-Rice propagation model. See Declaration of Michael B. McKinnon, attached hereto as Attachment 1.

As a result of the Dataworld study, Tribune has determined that there are a number of instances where unacceptable levels of interference will result either to its existing NTSC channels from proposed DTV channels or to its proposed DTV channels from existing NTSC channels. The detailed analyses of those instances are attached hereto as Attachment 2. That analysis is summarized as follows:

Tribune's station WLVI-TV, Cambridge, MA, will receive unacceptable interference from DTV assignments to its NTSC Channel 56. WNAC-TV, Providence, RI, has been assigned DTV Channel 54, and is separated from WLVI-TV by 48.5 km. WLNE, New Bedford, MA, has been assigned DTV Channel 49, and is separated from WLVI-TV by 78.6 km. Both DTV assignments are on "taboo channels" -- +/- 2 channels and +/- 7 channels. For such

channels, the Commission's rules prohibit an allotment at a distance of between 24.1 and 80.5 km. The WNAC and WLNE assignments result in interference to areas containing populations of 185,299 and 168,212, respectively, for a total of almost 354,000 out of 6,167,000 persons within the WLVI-TV NTSC service area.⁴

WLVI-TV will also receive interference on its DTV assignment, DTV Channel 41. That assignment is short-spaced with WVTM-TV, Windsor, VT, which operates on NTSC Channel 41. Those stations are located 161.3 km apart, far less than the required separation of 217.3 km required in the Commission's rules. As a result, 315,898 persons out of 6,360,688 persons in the WLVI-TV DTV service area will receive unacceptable interference.

Tribune's station WTIC-TV, Hartford, CT, will receive unacceptable interference to its NTSC Channel 61 from WNET, Newark, NJ, which has been assigned DTV Channel 61. WNET is 148.1 km from WTIC, which is significantly less than the Commission's required separation of 217.3 km. As a result, 1,909,166 persons, out of 4,756,257 persons in the WTIC NTSC service area, will receive interference.

⁴ The population numbers used in the Dataworld study are based on the use of a non-directional receive antenna. Although the Commission has assumed the use of outdoor directional receive antennas in its DTV assignments, Tribune submits that in the congested urban areas of the northeast the large majority of consumers are not likely to be using use outdoor antennas.

WTIC-TV has been assigned DTV Channel 5. That assignment is short-spaced with two existing NTSC stations, WNYW, New York, NY, and WCVB-TV, Boston, MA, each of which operates on NTSC Channel 5. The required separation for each is 244.6 km and each is located at a distance of only 148.1 km. As a result, there will be excessive interference to WTIC-TV from WCVB-TV and WNYW, to areas containing respectively 516,310 and 1,769,962 persons, for a total of 2,286,272 persons out of the total population of 5,286,041 within WTIC-TV's DTV service area.

Tribune's station WPHL-TV, Philadelphia, Pennsylvania, has been assigned DTV Channel 54. It will receive unacceptable interference from WNUV-TV, Baltimore, MD, NTSC Channel 54, from WFMZ-TV, Allentown, PA, NTSC Channel 69, and from the pending application for NTSC Channel 54 in Poughkeepsie, NY, 940426KG. For such co-channel allocations, the required minimum separation is 217.3 km. In fact, the NTSC channels in Baltimore and Poughkeepsie are at distances of only 154.8 and 213.8 km, respectively. For the 15-channel difference taboo, there can be no allotment between 24.1 and 80.5 kms. Allentown is 60.6 km distant. The resulting interference is to areas containing 692,449 (from the Baltimore station), 1,008,901 (from the Poughkeepsie allocation), and 504,523 (from the Allentown station) persons, for a total of 2,205,873 of the 8,435,282 persons in the WPHL-TV DTV service area.

Tribune's station WGNO, New Orleans, LA, operates on NTSC Channel 26. WUPL, Slidell, LA, has been assigned DTV Channel 24. The distance between the two is 34.1 km, notwithstanding the Commission's rule that prohibits second adjacent allotments between 24.1 and 96.6 kms.

As the foregoing demonstrates, the Commission's failure to adhere to its own separation requirements will result in unacceptable interference to an aggregate of more than 7,000,000 persons.⁵ Tribune submits that interference to such a large number of people is contrary to the public interest.⁶ Moreover, it can be avoided. Accordingly, the Commission should prepare a new DTV Assignment Table with closer adherence to its separation standards.

⁵ The Dataworld study has also revealed substantial unacceptable interference to Tribune's station WPIX, New York, NY, which operates on NTSC Channel 11, from the proposed short-spaced assignment of DTV Channel 11 to WFSB, Hartford, Connecticut. Tribune has joined with other affected parties in a "Joint Petition for Partial Reconsideration of WTNH Broadcasting, Inc., K-W TV, Inc., Post-Newsweek Stations, Connecticut, Inc. and Tribune Broadcasting Company," filed contemporaneously herewith. Accordingly, Tribune will not repeat in this Petition the matters raised in that petition.

⁶ Such a result is contrary to decisions by the Commission and the Courts that recognize that a loss of service area is not in the public interest. See, e.g., Hall v. FCC, 237 F.2d 567, 572 (D.C. Cir. 1956); New Jersey Public Broadcasting Authority, 74 F.C.C.2d 602, 605 (1979); KTVO, Inc., 57 Rad.Reg.2d (P&F) 648, 650 (1984).

II. IN RE-DOING THE DTV TABLE, THE COMMISSION SHOULD IMPROVE THE REPLICATION OF NTSC SERVICE AREAS.

Two of Tribune's television stations, KTLA and KWGN-TV, have been assigned DTV channels and power levels which do not effectively replicate their NTSC coverage. In re-doing the DTV Table in order to correct the problems caused by its failure to adhere to its spacing requirements, the Commission should also improve the replication of NTSC service coverage in those instances.

KTLA, Los Angeles, CA, operating on NTSC Channel 5, has been assigned DTV Channel 68 at 1000.0 kw, replicating 80.8 percent of its existing NTSC coverage. The population in KTLA's NTSC service contour is 14,254,000. In its predicted DTV service contour, KTLA will reach a population of 13,093,000. The loss of 1,161,000 in population served represents approximately 8.1 percent of the population in KTLA's service contour and 5.0 percent of the entire population in the Los Angeles DMA. Moreover, it appears that the lost service areas are in critical counties where population growth is expected, thus aggravating the loss.

KWGN-TV, Denver, CO, operating on NTSC Channel 2, has been assigned DTV Channel 34 at 1000.0 kw, replicating only 91.1 percent of its existing coverage. Tribune is in the process of analyzing that situation. Preliminarily, Tribune has found no short-spacing issues and it appears that the replication may be

substantially improved through a power increase. Nonetheless, should the Commission conclude that the DTV Assignment Table should be run again, such an extreme case of a loss of service area should be addressed and corrected.

III. THE COMMISSION SHOULD ADDRESS THE ISSUE OF WIRELESS MICROPHONES.

In its Reply Comments to the Sixth Further NPRM in this proceeding, Tribune urged the Commission to provide some spectrum for secondary uses of vacant television channels by broadcasters. Specifically, Tribune urged the Commission to provide some mechanism for television licensees to continue to use wireless microphones and other equipment. The Commission failed to address that issue in its Fifth or Sixth Report and Order. Broadcasters are thus left without guidance as to what to do on a matter that is vital to the coverage of local news, especially in such congested markets as New York and Los Angeles. On reconsideration the Commission should address that issue.

IV. DTV-DTV ADJACENT CHANNEL INTERFERENCE.

Tribune submits that, in its calculations, the FCC's DTV model did not adequately account for DTV-DTV adjacent channel interference arising in the form of sideband splatter. The ratio of desired to undesired (D/U) signal relied upon by the Commission's DTV model to assign DTV channels was based on the

ATTC's test results. However, there was no co-channel noise component present during the ATTC's testing -- a perfectly appropriate environment for testing but not an environment that can be recreated in the field. The Charlotte DTV field tests have confirmed the existence of sideband splatter on adjacent DTV channels -- sideband splatter that would be permitted by the FCC's emissions mask. Accordingly, the Commission should adjust its DTV model to recognize interference created by certain DTV-DTV adjacent channel assignments.

In addition, Tribune submits that available test data suggests that the issue of sideband splatter from DTV-DTV adjacent channels is not adequately managed by the FCC's RF emissions mask given the adjacent channel DTV-DTV spacing rules contained in the Sixth Report and Order. Because these spacing rules were published for the first time in the Sixth Report & Order, Tribune submits that the Commission should more carefully evaluate the available DTV test data and revise its DTV-DTV spacing rules accordingly.

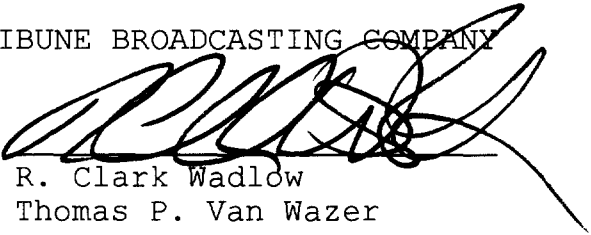
V. CONCLUSION

In conclusion, unless the Commission acts to re-do the DTV Assignment Table with a more stringent adherence to its own spacing requirements, it will deny existing NTSC service to millions of viewers and frustrate the development and acceptance of DTV service. Tribune submits that such results are contrary to the public's interest in the continued availability of the highest quality, free, over-the-air television service.

Respectfully submitted,

TRIBUNE BROADCASTING COMPANY

By


R. Clark Wadlow
Thomas P. Van Wazer

Sidley & Austin
1722 Eye Street, N.W.
Washington, D.C. 20006

Its Attorneys

June 13, 1997

ATTACHMENT 1

DECLARATION OF
MICHAEL B. MCKINNON

Mike McKinnon
Director/Station Engineering
317/687-6510

TRIBUNE

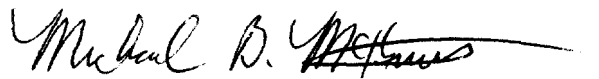
BROADCASTING

1440 North Meridian Street
Indianapolis, IN 46202
FAX: 317/687-6532
mbmckinnon@tribune.com

DECLARATION

I, Michael B. McKinnon, do declare and state as follows:

1. I am Director of Station Engineering for Tribune Broadcasting Company, a subsidiary of Tribune Company.
2. At my request, Dataworld, Inc. conducted studies of the NTSC and DTV service areas of each of the sixteen television stations licensed to subsidiaries of Tribune Company. Dataworld prepared contour maps using both the standard predicted contour method and the Longley-Rice propagation model. Dataworld also analyzed other stations in the markets in which the Tribune stations are licensed and in adjacent and surrounding markets.
3. Dataworld prepared large-scale, 36 inch by 36 inch, color coded maps with overlays. Due to the shortness of time, it has not been possible to reproduce those maps for submission to the Federal Communications Commission with the instant Petition. The base maps show the market and the predicted service contours. There are two overlays. The first shows the Tribune station's Longley-Rice signal levels and received interference for its digital allocation. The second shows the Tribune station's Longley-Rice signal levels and received interference for its existing NTSC channel assignment.
4. Dataworld also calculated the population in the areas receiving interference, as set forth in the Petition.
5. Dataworld also calculated the distance between the Tribune stations and the stations causing such interference, as set forth in the Petition.
6. The statements contained herein and in the Petition are true and correct to the best of my knowledge, information, and belief.


Michael B. McKinnon

ATTACHMENT 2

DATAWORLD, INC. STUDY

Tribune Broadcasting, Co.
Indianapolis, IN

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NTSC Interference Study Station Retrieval:

Title: WLVI (NTSC)

Call Sign	City	St	Ch	ERP (kW)	HAAT (m)	HAMSL (m)	d/u (dB)	Dist (km)	IXcon dx-km	Clear -ance
WVTA	Windsor	VT	41 N	1050.0	709	992	-6.00	161.3	98.9	-19.3*
WYDN	Worcester	MA	48 N	3020.0	246	482	-32.00	55.8	28.3	-54.1*
WYDN	Worcester	MA	48 N	3020.0	398	617	-32.00	84.7	34.6	-31.5*
WLED-TV	Littleton	NH	48 D	50.0	388	743	-31.62	231.9	11.7	138.5
WLNE	New Bedford —	MA	49 D	1000.0	287	308	-35.00	78.6	19.6	-22.6*
WEKW-TV	Keene	NH	49 D	50.0	331	607	-35.00	124.1	8.8	33.7
WEDW	Bridgeport	CT	49 N	1950.0	223	307	-30.00	198.9	27.3	89.9
WLED-TV	Littleton	NH	49 N	93.3	388	743	-30.00	231.9	15.7	134.5
WHRC	Norwell	MA	52 D	50.0	74	96	-34.00	34.4	4.7	-52.0*
WEDW	Bridgeport	CT	52 D	50.0	223	307	-34.00	198.9	8.0	109.2
WEDN	Norwich	CT	53 N	794.0	207	299	-33.00	117.3	17.4	18.2*
WCAX-TV	Burlington	VT	53 D	782.0	840	1265	-29.73	278.8	39.3	157.8
WNAC-TV	Providence —	RI	54 D	88.6	314	343	-23.73	48.5	21.4	-54.6*
WGGB-TV	Springfield	MA	55 D	192.2	321	420	-17.43	117.9	35.6	0.6*
WVER	Rutland	VT	56 D	50.0	431	688	34.44	215.2	213.8	-80.3*
WENH-TV	Durham —	NH	57 D	1000.0	303	463	-11.95	97.0	57.0	-41.6*
WGBY-TV	Springfield	MA	57 N	1200.0	305	403	-13.00	117.8	56.6	-20.5*
WGBY-TV	Springfield	MA	57 N	1480.0	306	404	-13.00	117.8	58.4	-22.3*
WZBU	Vineyard Haven	MA	58 N	1150.0	138	145	-29.00	99.3	20.0	-2.4*
WZBU	Vineyard Haven	MA	58 N	1150.0	138	145	-29.00	99.3	20.0	-2.4*
WGBY-TV	Springfield	MA	58 D	50.0	305	403	-27.93	117.8	13.2	22.9*
WMUR-TV	Manchester	NH	59 D	1000.0	323	461	-34.13	81.4	21.9	-22.2*
WBNE	New Haven	CT	59 N	5000.0	314	412	-34.00	173.7	31.5	60.6
WBNE	New Haven	CT	59 N	100.0	280	378	-34.00	173.7	10.5	81.5
WGOT	Merrimack	NH	60 N	1410.0	308	446	-23.00	81.5	40.2	-40.4*
WNAC-TV	Providence	RI	64 N	3673.0	314	343	-41.00	48.5	20.1	-53.2*

* - Station retained for Longley-Rice analysis.

Tribune Broadcasting, Co.
Indianapolis, IN

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Population Within Coverage Area

Title: WLVI (NTSC)
Service Threshold: 64.0 dBuV/m

Latitude: 42-18-12
Longitude: 71-13-08

County name	State	Housing Units	Population
WLNE-DTV:		Interference: 484	1,204
WEDN-Lic:		Interference: 68	184
WNAC-DTV:		Interference: 51,756	120,800
		Net Served: 182,537	451,928
Washington County	RI	Potential: 13,255	37,412
WLNE-DTV:		Interference: 4,569	10,760
WNAC-DTV:		Interference: 45	4,838
		Net Served: 8,641	21,814
Total for state	RI	Potential: 355,969	876,554
WYDN-CP :		Interference: 178	423
WLNE-DTV:		Interference: 26,381	61,002
WEDN-Lic:		Interference: 104	268
WNAC-DTV:		Interference: 67,732	164,514
		Net Served: 261,574	650,347
		Net Served: 0	0
Total for all states and counties:		Potential: 2,476,223	6,166,969
WYDN-CP :		Interference: 8,077	20,131
WYDN-App:		Interference: 55,567	139,617
WLNE-DTV: —		Interference: 70,366	168,212
WEDN-Lic:		Interference: 204	552
WNAC-DTV: —		Interference: 75,790	185,299
WVER-DTV:		Interference: 177	519
WGBY-CP :		Interference: 1,272	3,379
WENH-DTV: —		Interference: 112,872	267,331
WZBU-Lic:		Interference: 19,031	26,362
WZBU-CP :		Interference: 2,971	6,514
WMUR-DTV:		Interference: 365	580
WGOT-Lic:		Interference: 63,046	163,127
		Net Served: 2,066,485	5,185,346

Tribune Broadcasting, Co.
Indianapolis, IN

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DTV Interference Study Station Retrieval

Title: WLVI (DTV)

Call Sign	City	St Ch	ERP (kw)	HAAT (m)	HAMSL (m)	d/u (dB)	Dist (km)	IXcon dx-km	Clear -ance
WNBU	Concord	NH 33 D	71.4	343	510	-63.00	98.3	7.1	11.3*
WWLP	Springfield	MA 33 D	158.0	266	346	-63.00	124.7	8.1	36.7
WETK	Burlington	VT 33 N	1350.0	814	1239	-58.00	278.7	33.5	165.3
WGOT	Merrimack	NH 34 D	50.0	308	446	-63.00	81.5	6.1	-4.6*
WTWS	New London	CT 34 D	111.7	383	447	-63.00	127.6	8.4	39.2
WSBK-TV	Boston	MA 38 N	2370.0	360	401	-61.79	0.0	21.9	-101.9*
WSBK-TV	Boston	MA 38 N	5010.0	360	401	-61.79	0.0	26.3	-106.2*
WGME-TV	Portland	ME 38 D	791.1	491	607	-60.61	189.7	20.3	89.5
WSBK-TV	Boston	MA 39 D	67.7	360	401	-60.52	0.0	8.4	-88.3*
WEDY	New Haven	CT 39 D	50.0	88	133	-60.52	177.0	4.2	92.8
WVLA	Lewiston	ME 39 D	50.0	278	355	-60.52	186.8	7.0	99.8
WZBU	Vineyard Haven	MA 40 D	50.0	138	145	-41.98	99.3	15.1	4.3*
WGGB-TV	Springfield	MA 40 N	4270.0	321	420	-47.73	117.9	46.2	-8.2*
WVTA	Windsor —	VT 41 N	1050.0	709	992	1.81	161.3	255.5	-174.1*
WHDH-TV	Boston	MA 42 D	907.4	310	351	-43.17	0.9	41.8	-120.9*
WHAI-TV	Bridgeport	CT 42 D	50.0	157	272	-43.17	188.7	15.2	93.6
WGBX-TV	Boston	MA 43 D	50.0	331	373	-59.13	1.7	8.2	-86.4*
WHAI-TV	Bridgeport	CT 43 N	2290.0	157	272	-59.86	188.7	15.1	93.7
WFFF-TV	Burlington	VT 43 D	50.0	839	1264	-59.13	278.7	11.6	187.2
WGBX-TV	Boston	MA 44 N	1510.0	331	373	-62.49	1.7	17.7	-95.9*
WCSH	Portland	ME 44 D	1000.0	619	772	-61.53	177.8	22.7	75.2
WFFF-TV	Burlington	VT 44 N	1460.0	839	1264	-62.49	278.7	26.9	171.9
WEDN	Norwich	CT 45 D	50.0	207	299	-62.00	117.3	5.7	31.7*
WMEA-TV	Biddeford	ME 45 D	50.0	243	360	-62.00	128.4	6.1	42.4
WYDN	Worcester	MA 48 N	3020.0	246	482	-58.00	55.8	24.2	-48.3*
WYDN	Worcester	MA 48 N	3020.0	398	617	-58.00	84.7	29.9	-25.1*
WLFD-TV	Littleton	NH 48 D	50.0	388	743	-63.00	231.9	6.6	145.3
WLNE	New Bedford	MA 49 D	1000.0	287	308	-63.00	78.6	13.6	-14.9*
WEKW-TV	Keene	NH 49 D	50.0	331	607	-63.00	124.1	6.3	37.9
WEDW	Bridgeport	CT 49 N	1950.0	223	307	-58.00	198.9	20.6	98.4
WLFD-TV	Littleton	NH 49 N	93.3	388	743	-58.00	231.9	11.2	140.8
WGGB-TV	Springfield	MA 55 D	192.2	321	420	-63.00	117.9	9.2	28.8*
WVER	Rutland	VT 56 D	50.0	431	688	-63.00	215.2	6.8	128.4

Tribune Broadcasting, Co.
Indianapolis, IN

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Population Within Coverage Area

Title: WLVI (DTV)
Service Threshold: 41.0 dBuV/m

Latitude: 42-18-11
Longitude: 71-13-06

County name	State	Housing Units	Population

Total for state	RI	Potential: 365,262	903,432
WVTA-Lic:		Interference: 3,261	8,466
WYDN-CP :		Interference: 35	100
WLNE-DTV:		Interference: 14,803	34,503
		Net Served: 347,163	860,363
		Net Served: 0	0
Total for all states and counties:		Potential: 2,554,144	6,360,686
WGOT-DTV:		Interference: 32	99
WGGB-Lic:		Interference: 141	414
WZBU-DTV:		Interference: 15,442	24,024
WVTA-Lic: —		Interference: 126,671	315,898
WHDH-DTV:		Interference: 158	539
WYDN-CP :		Interference: 6,646	17,371
WYDN-App:		Interference: 35,306	86,016
WLNE-DTV:		Interference: 34,221	83,590
		Net Served: 2,335,527	5,832,735

Tribune Broadcasting, Co.
Indianapolis, IN

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NTSC Interference Study Station Retrieval:

Title: WTIC

Call Sign	City	St	Ch	ERP (kW)	HAAT (m)	HAMSL (m)	d/u (dB)	Dist (km)	IXcon dx-km	Clear-ance
WHRC	Norwell	MA	46 N	501.0	107	141	-6.00	151.1	46.2	3.3*
WHRC	Norwell	MA	46 N	5.9	74	96	-6.00	171.3	13.6	56.0
WNJU	Linden	NJ	47 N	4570.0	458	471	-23.00	148.1	57.3	-10.9*
WEDN	Norwich	CT	53 N	794.0	207	299	-32.00	58.9	18.6	-61.4*
WHSE-TV	Newark	NJ	53 D	53.5	438	452	-31.62	143.5	12.7	29.2*
WWAC-TV	Atlantic City	NJ	53 N	5000.0	151	151	-32.00	260.5	25.4	133.5
WWAC-TV	Atlantic City	NJ	53 N	12.2	87	88	-32.00	292.2	4.1	186.5
WCAX-TV	Burlington	VT	53 D	782.0	840	1265	-31.62	313.9	35.8	176.5
NEW	Poughkeepsie	NY	54 N	5000.0	491	601	-30.00	96.6	45.5	-50.5*
WTBY	Poughkeepsie	NY	54 N	5000.0	491	601	-30.00	96.6	45.5	-50.5*
WNAC-TV	Providence	RI	54 D	88.6	314	343	-35.00	128.7	10.1	17.0*
WENH-TV	Durham	NH	57 D	1000.0	303	463	-34.00	211.1	21.4	88.1
WGBY-TV	Springfield	MA	58 D	50.0	305	403	-29.73	61.7	11.8	-51.7*
WNJB	New Brunswick	NJ	58 N	1321.0	215	281	-33.00	184.6	20.6	62.3
WBNE	New Haven	CT	59 N	5000.0	314	412	-26.00	32.7	44.8	-113.7*
WBNE	New Haven	CT	59 N	100.0	280	378	-26.00	32.7	18.1	-87.0*
WMUR-TV	Manchester	NH	59 D	1000.0	323	461	-23.73	175.2	37.1	36.4
NEW	Vineland	NJ	59 N	708.0	243	269	-26.00	277.5	27.7	148.1
NEW	Vineland	NJ	59 N	1500.0	59	77	-26.00	313.9	15.6	196.7
WGOT	Merrimack	NH	60 N	1410.0	308	446	-3.00	175.3	84.6	-11.0*
WNET	Newark —	NJ	61 D	190.2	497	510	34.44	148.1	253.8	-207.4*
NEW	Saranac Lake	NY	61 N	1000.0	440	970	45.00	304.1	368.3	-165.9*
NEW	Saranac Lake	NY	61 N	545.0	440	970	45.00	304.1	348.6	-146.1*
WRNN-TV	Kingston	NY	62 N	5000.0	592	974	-13.00	113.2	91.8	-80.3*
WMFP	Lawrence	MA	62 N	5000.0	186	202	-13.00	163.4	59.7	2.0*
WACI	Atlantic City	NJ	62 N	5000.0	142	145	-13.00	261.9	56.0	104.3
WACI	Atlantic City	NJ	62 N	5000.0	308	313	-13.00	266.9	70.7	94.5
WMBC-TV	Newton	NJ	63 N	2190.0	222	485	-29.00	166.0	29.4	35.0
WNAC-TV	Providence	RI	64 N	3673.0	314	343	-34.00	128.7	29.5	-2.4*
WEDY	New Haven	CT	65 N	7.9	88	133	-23.00	42.2	6.2	-65.6*
WHSP-TV	Vineland	NJ	65 N	3800.0	283	310	-23.00	276.7	46.4	128.6
WHSP-TV	Vineland	NJ	65 N	5000.0	283	310	-23.00	276.7	48.5	126.5
WHSE-TV	Newark	NJ	68 N	35.6	438	452	-33.00	143.5	10.2	31.6*
WHSE-TV	Newark	NJ	68 N	5000.0	438	452	-33.00	143.5	38.1	3.8*

* = Station retained for Longley-Rice analysis.

Tribune Broadcasting, Co.
Indianapolis, IN

Page
June 3, 199

Population Within Coverage Area

Title: WTIC (NTSC)
Service Threshold: 64.0 dBuV/m

Latitude: 41-42-13
Longitude: 72-49-57

County name	State	Housing Units	Population
Total for all states and counties:		Potential: 1,874,726	4,756,257
WEDN-Lic:		Interference: 28,683	74,154
940426KG:		Interference: 551	1,413
WTBY-Lic:		Interference: 142	186
WGBY-DTV:		Interference: 8,469	19,266
WBNE-CP :		Interference: 62,512	156,514
WGOT-Lic:		Interference: 1,209	3,328
WNET-DTV: —		Interference: 716,910	1,909,166
951106KH:		Interference: 108	251
WMFP-Lic:		Interference: 863	2,893
WRNN-Lic:		Interference: 2,945	5,624
WNAC-Lic:		Interference: 1,656	5,064
WEDY-Lic:		Interference: 2,099	4,216
WOST-CP :		Interference: 2,915	7,534
WOST-App:		Interference: 319	842
		Net Served: 1,045,345	2,565,806

Tribune Broadcasting, Co.
Indianapolis, IN

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May 30, 1997

DTV Interference Study Station Retrieval

Title: WTIC (DTV)

Call Sign	City	St	Ch	ERP (kW)	HAAT (m)	HAMSL (m)	d/u (dB)	Dist (km)	IXcon dx-km	Clear -ance
WNYW	New York	NY	5 N	17.4	512	525	1.81	148.1	182.3	-118.9*
WCVB-TV	Boston	MA	5 N	100.0	303	345	1.81	148.1	204.4	-141.0*
WPTZ	North Pole	NY	5 N	25.1	615	920	1.81	326.4	197.7	44.0
WENE	New Haven	CT	6 D	1.0	280	378	-43.17	32.7	10.3	-62.2*
WLNE	New Bedford	MA	6 N	100.0	287	308	-48.71	137.0	25.1	27.2*
WRGB	Schenectady	NY	6 N	93.3	321	558	-48.71	141.3	26.0	30.5*
WCSH	Portland	ME	6 N	100.0	619	772	-48.71	295.6	39.0	171.9

Tribune Broadcasting, Co.
Indianapolis, IN

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June 2, 1997

Population Within Coverage Area

Title: WTIC (DTV)
Service Threshold: 27.8 dBuV/m

Latitude: 41-42-13
Longitude: 72-49-57

County name	State	Housing Units	Population
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Total for state	VT	Potential: 232	344
WCVB-Lic:		Interference: 220	329
		Net Served: 12	15

Total for all states and counties:

WCVB-Lic: —	Potential: 2,084,973	5,286,041
WNYW-Lic: —	Interference: 217,832	516,310
WBNE-DTV:	Interference: 648,524	1,769,962
WRGB-Lic:	Interference: 15	39
	Interference: 1,408	2,842
	Net Served: 1,217,194	2,996,888

TRIBUNE BROADCASTING CO.
INDIANAPOLIS, IN

Page :
May 23, 1997

DTV Interference Study Station Retrieval

Title: WPHL-TV PHILADELPHIA, PA

Call Sign	City	St	Ch	ERP (kW)	HAAT (m)	HAMSL (m)	d/u (dB)	Dist (km)	IXcon dx-km	Clear -ance
WFMZ-TV	Allentown	PA	46 D	50.0	315	464	-63.00	60.6	5.7	-27.6*
WWAC-TV	Atlantic City	NJ	46 D	50.0	87	88	-63.00	99.8	3.4	13.9*
WBFF	Baltimore	MD	46 D	50.0	412	496	-63.00	143.9	6.2	55.2
WSKG-TV	Binghamton	NY	46 N	603.0	373	769	-58.00	231.6	18.1	131.0
WPMT	York	PA	47 D	215.8	416	554	-63.00	115.8	9.8	23.5*
WNJU	Linden	NJ	47 N	4570.0	458	471	-58.00	127.9	32.9	12.5*
WMDT	Salisbury	MD	47 N	2190.0	307	312	-58.00	176.5	23.2	70.8
WAWB	Ashland	VA	47 D	50.0	262	295	-63.00	309.5	5.3	221.7
WTVH	Syracuse	NY	47 D	1000.0	288	574	-63.00	332.0	12.7	236.8
WNJN	Montclair	NJ	50 N	2090.0	238	305	-58.00	126.9	20.3	24.1*
WNJN	Montclair	NJ	50 N	2090.0	238	305	-58.00	126.9	20.3	24.1*
WBDC-TV	Washington	DC	50 N	2450.0	252	311	-58.00	194.7	21.8	90.4
WYDC	Corning	NY	50 D	50.0	166	597	-58.00	279.7	6.2	191.0
WOCD	Amsterdam	NY	50 D	131.0	223	449	-58.00	338.9	9.1	247.4
WTVE	Reading	PA	51 N	5000.0	395	533	-61.79	50.6	25.9	-57.8*
NEW	Reading	PA	51 N	5000.0	153	302	-61.79	62.1	15.2	-35.6*
WTVE	Reading	PA	51 N	1450.0	232	373	-61.79	65.9	13.5	-30.1*
WNJN	Montclair	NJ	51 D	171.6	238	305	-60.61	126.9	8.6	35.9
WBDC-TV	Washington	DC	51 D	62.2	252	311	-60.61	194.7	6.7	105.5
NEW	Pittsfield	MA	51 N	5000.0	340	781	-61.79	322.7	24.1	216.1
WNJT	Trenton	NJ	52 N	1392.0	271	306	-62.45	54.0	13.9	-42.4*
WMAR-TV	Baltimore	MD	52 D	1000.0	306	389	-60.52	144.1	15.5	46.1
WEDW	Bridgeport	CT	52 D	50.0	223	307	-60.52	221.2	6.0	132.7
NEW	Ithaca	NY	52 N	764.0	122	496	-62.45	280.9	8.2	190.2
NEW	Ithaca	NY	52 N	100.0	146	539	-62.45	282.3	5.3	194.5
WWAC-TV	Atlantic City	NJ	53 N	12.2	87	88	-47.73	99.8	5.8	11.5*
WWAC-TV	Atlantic City	NJ	53 N	5000.0	151	151	-47.73	114.0	34.4	-2.9*
WHSE-TV	Newark	NJ	53 D	53.5	438	452	-41.98	132.1	27.2	22.4*
WMDT	Salisbury	MD	53 D	59.9	307	312	-41.98	176.5	23.7	70.3
VILF	Williamsport	PA	53 N	1320.0	243	548	-47.73	204.8	32.0	90.3
VILF	Williamsport	PA	53 N	12.3	221	526	-47.73	204.8	9.0	113.3
VNVT	Goldvein	VA	53 N	2290.0	232	310	-47.73	245.9	35.1	128.3
VNUV-TV	Baltimore —	MD	54 N	5000.0	353	451	1.81	154.8	261.2	-188.9*
JEW	Poughkeepsie	NY	54 N	5000.0	491	601	1.81	213.8	273.9	-142.6*
JTBY	Poughkeepsie	NY	54 N	5000.0	491	601	1.81	213.8	273.9	-142.6*
VSTM-TV	Syracuse	NY	54 D	1000.0	300	597	15.27	331.0	297.3	-48.8*
WBET	Richmond	VA	54 D	1000.0	251	305	15.27	343.4	291.8	-30.9*
WHYY-TV	Wilmington	DE	55 D	1000.0	295	360	-43.17	0.0	39.9	-122.4*
WENY-TV	Elmira	NY	55 D	50.0	324	718	-43.17	267.1	21.7	162.9
WOCD	Amsterdam	NY	55 N	5000.0	223	449	-48.71	338.9	38.5	218.0

* = Station retained for Longley-Rice analysis.

TRIBUNE BROADCASTING CO.
INDIANAPOLIS, IN

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May 23, 1997

DTV Interference Study Station Retrieval

Title: WPHL-TV PHILADELPHIA. PA

Call Sign	City	St Ch	ERP (kW)	HAAT (m)	HMSL (m)	d/u (dB)	Dist (km)	IXcon dx-km	Clear -ance
WCBS-TV	New York	NY 56 D	349.0	481	494	-59.13	127.9	16.0	29.4*
WVLF-TV	Hazleton	PA 56 N	1000.0	328	671	-59.86	131.7	17.2	32.0*
WVLF-TV	Hazleton	PA 56 N	1600.0	504	888	-59.86	137.7	24.3	30.9*
WCPB	Salisbury	MD 56 D	81.5	158	167	-59.13	186.6	6.5	97.7
WNVC	Fairfax	VA 56 N	1259.0	215	304	-59.86	214.1	14.1	117.5
WNVC	Fairfax	VA 56 N	1259.0	222	311	-59.86	214.1	14.3	117.3
WPSG	Philadelphia	PA 57 N	5000.0	356	419	-62.49	0.4	23.7	-105.8*
WPSG	Philadelphia	PA 57 N	5010.0	359	423	-62.49	0.4	23.8	-105.9*
WHTM-TV	Harrisburg	PA 57 D	110.6	340	498	-61.53	148.5	8.2	57.8
WNVC	Fairfax	VA 57 D	50.0	222	311	-61.53	214.1	5.6	126.0
JEW	Waverly	NY 57 N	30.0	94	462	-62.49	248.1	3.1	162.4
JEW	Waverly	NY 57 N	1550.0	299	674	-62.49	250.1	15.2	152.4
JCVW	Richmond	VA 57 N	1000.0	294	360	-62.49	347.8	13.3	252.0
WNJB	New Brunswick	NJ 58 N	1321.0	215	281	-58.00	89.7	16.7	-9.5*
JGAL	Lancaster	PA 58 D	366.4	414	552	-62.00	117.4	12.2	22.7*
JEW	Waldorf	MD 58 N	2570.0	218	266	-58.00	210.0	20.5	107.0
JHEC-TV	Rochester	NY 58 D	1000.0	154	301	-62.00	395.3	10.1	302.8
WTGI-TV	Wilmington	DE 61 N	3000.0	293	312	-58.00	38.8	24.5	-68.2*
WNET	Newark	NJ 61 D	190.2	497	510	-63.00	127.9	10.2	35.1
WTIC-TV	Hartford	CT 61 N	5000.0	520	619	-58.00	274.1	35.4	156.2
WLVT-TV	Allentown	PA 62 D	50.0	303	454	-63.00	60.6	5.6	-27.5*
WACI	Atlantic City	NJ 62 N	5000.0	308	313	-58.00	89.1	28.1	-21.5*
WACI	Atlantic City	NJ 62 N	5000.0	142	145	-58.00	96.0	19.4	-5.9*
WFPT	Frederick	MD 62 N	3390.0	138	276	-58.00	198.1	17.1	98.5
WFPT	Frederick	MD 62 N	3162.0	214	352	-58.00	198.1	21.4	94.2
WRNN-TV	Kingston	NY 62 N	5000.0	592	974	-58.00	246.5	37.2	126.8
WHSE-TV	Newark	NJ 68 N	5000.0	438	452	-58.00	132.1	32.9	16.7*
WHSE-TV	Newark	NJ 68 N	35.6	438	452	-58.00	132.1	8.2	41.4
WNYT	Syracuse	NY 68 N	1000.0	446	799	-58.00	325.6	22.8	220.4
WNYT	Syracuse	NY 68 N	311.0	446	799	-58.00	325.6	16.2	227.0
WFMZ-TV	Allentown	PA 69 N	1078.0	315	464	-58.00	60.6	19.5	-41.4*
WFMZ-TV	Allentown	PA 69 N	1780.0	315	464	-58.00	60.6	22.3	-44.2*
WEW	Fredericksburg	VA 69 N	1500.0	109	188	-58.00	281.7	11.8	187.5

* Station retained for Longley-Rice analysis.